From: James A. Peeples

Sent: Friday, July 20, 2012 11:28 AM

To: 'O'Connor, David A.'

Subject: RE: Grenada 4/26/12 meeting summary

Dave,

Still no comments from Meredith on the MW-20 Work Plan?

Thanks,

James Peeples, PE

T&M Asociates

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From: O'Connor, David A. [mailto:David.OConnor@Meritor.com]

Sent: Thursday, July 19, 2012 2:06 PM

To: James A. Peeples

Subject: FW: Grenada 4/26/12 meeting summary



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From: O'Connor, David A.

Sent: Tuesday, May 01, 2012 1:30 PM **To:** Meredith Anderson; Dave Jenkins **Cc:** Al-Fayyomi Ihsan; Jim Peeples

Subject: RE: Grenada 4/26/12 meeting summary

Meredith and Dave:

Thank you again for meeting with us last Thursday. I have included my comments in **blue** to clarify my understanding of our discussions and my commitments to the issues you have detailed below. It is also my

recollection that the MW-20 Work Plan (March 15, 2012) was verbally approved in our meeting. Will you please confirm this approval?

Please call me with any questions. Thank you.

P.S. No snakes in trees thus far but I am being cautious just the same!



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From: Meredith Anderson [mailto:Anderson.Meredith@epamail.epa.gov]

Sent: Monday, April 30, 2012 5:54 PM

To: O'Connor, David A.; Al-Fayyomi Ihsan; Jim Peeples

Cc: Dave Jenkins

Subject: Grenada 4/26/12 meeting summary

David,

Thanks for meeting with Dave Jenkins and I on 4/26/12 in Atlanta. As with our previous meeting, the Brown and Caldwell offices here in Atlanta were very convenient and comfortable. I appreciate you, Ihsan, and Jim making the effort to travel to Atlanta.

I'd like to summarize the meeting and the key points of agreement for our records:

- * Discussion focused on the items addressed in the 3/16/12 and 4/11/12 letters from EPA to Meritor, Inc. concerning the effectiveness of the PRB, potential off-site migration of site contaminants near MW-20, and other on-site increases in contaminants. **Discussion included decreases in on-site contaminants as well.**
- * Additional investigations will take place near MW-20 (new wells installed north, up-gradient, and downgradient of MW-20 at edge of plume), and MW-20 will remain in place for future monitoring. Investigations will begin as soon as possible (summer 2012). We agreed to collect a groundwater grab sample and analyze for the target VOCs (no metals) from an area north of MW-20 to see if a well would be appropriate. If we find non-impacted water approximately 20' further north of MW-20, then we will install a well. At a minimum, an upgradient and downgradient well will be installed as detailed in the MW-20 Work Plan dated March 15, 2012.
- * If offsite migration of VOCs in the residential area is identified, swift follow-up investigations, monitoring, and community engagement activities will proceed, with remediation and response actions if warranted. We committed to providing EPA groundwater results from the 3 areas north of MW-20 within 48 hours of validation and scheduling a conference call within one week following submittal of the results to discuss next steps, if any. We will provide a report detailing home construction and potable water feeds by address as well as a water well survey for the area to verify there is not a drinking water exposure pathway. We will also run the Johnson Ettinger model assuming worst-case scenario with a home positioned atop MW-20 with a TCE concentration of 88 ug/L (i.e., the most recent sampling result). If the results of this work are

inconclusive, then we will discuss a proposal to evaluate a second line of evidence related to VI impact and proceed quickly with any additional work following approval.

- * New well clusters (shallow/deep) will be installed at the north and south ends of the PRB to determine if site contaminants are migrating around the ends of the wall (to be conducted as soon as possible (summer 2012)).
- * A new deep well will be installed near MW-14 (to be conducted as soon as possible (summer 2012)).
- * A summary of past indoor air monitoring results will be prepared and presented to EPA with a request to terminate indoor air sampling. EPA will consider the request and supporting data and make a determination about future indoor air monitoring. We will provide technical support that includes groundwater trends validating decreasing CVOC concentrations beneath the manufacturing plant, discussion of the 2003, 2004 and 2009 IA findings, and if possible correspondence from Don Webster regarding the end to IA monitoring following the 2009 sampling event.
- * The 2011 monitoring report will be submitted to EPA in June 2012. All 2011 data (and future monitoring data) will also be submitted in EPA Region 4's electronic data deliverables (EDD) format.
- * 2012 quadrennial monitoring will take place the week of 4/30/12. Data will be provided to the EPA in Region 4's EDD format within 48 hours of validation.
- * The 2012 monitoring report will be submitted to the EPA by the end of the calendar year.
- * Per the 2010 HSWA permit, semi-annual reports will be submitted to EPA documenting the status of all SWMUs, summarizing activities undertaken, and describing any issues arisen (one report will be the annual monitoring report; the other, an informal summary letter). We committed to providing EPA the 2011 Annual Report, in EDD format, by June 2012. This report serves as the first semi-annual effectiveness report for calendar year 2012. The second semi-annual effectiveness report will be provided in a summary letter by year-end 2012 and will include a discussion of the May 2012 quadrennial sampling and summer 2012 sampling and analytical results for new work discussed herein.
- * A comprehensive effectiveness review of the PRB, including costs of O&M/iron rejuvenation/monitoring and estimated clean-up timeframes, will be conducted and submitted to EPA as soon as prepared by consultant. It is expected that this review will be completed late 2012 or early 2013 pending completion of ETI's evaluation of the PRB testing and the third-party consultant peer review of the current remediation strategy. A summary report will be provided to EPA following this work. The year-end 2012 semi-annual effectiveness report will include the status of this work.
- * All graphs will be prepared in log form, with consistent axes and MCLs indicated. All contour maps will indicate the corresponding MCLs as well.
- * For all future sampling, sample turbidity will be <10 NTU. We indicated that we intend to meet the suggested turbidity levels where possible, however an alternative sampling procedure may be proposed for all or some of the wells if this is unattainable.

Issues that may be discussed at a later date are:

- * The need for an additional monitoring well cluster downgradient of the PRB between the existing well clusters.
- * The need for a new monitoring well to replace MW-2.
- * Arsenic as a COC if impacts are found in Riverdale Creek.

Please let me know if I have summarized any portions of this meeting incorrectly or if you have additional items to include. Thank you and stay cool in Mississippi this week! Any snakes hanging from trees yet?

Meredith C. Anderson Environmental Engineer RCRA Div/Corrective Action Section EPA-Region 4 61 Forsyth Street, SW Atlanta, GA 30303 404-562-8608 404-562-8439 (fax) anderson.meredith@epa.gov

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